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Attorneys for Plaintiffs
Skysun LLC and Vladyslav Yurov

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

SKYSUN LLC, a California limited liability company, VLADYSLAV YUROV, an individual;	)	Case No.:	24STCV10998
	)		
PLAINTIFFS,	)		
	)	COMPLAINT FOR DECLARATORY	
v.	)	RELIEF	
	)		
CITY OF LOS ANGELES, a municipal corporation, and DOES 1 – 10,	)		
	)		
DEFENDANTS.	)		
	)		

Plaintiffs Skysun LLC and Vladyslav Yurov ("Plaintiffs") hereby allege against Defendants City of Los Angeles and DOES 1 through 10, inclusive, as follows.

FIRST CAUSE OF ACTION

(Declaratory Relief Against Defendants City of Los Angeles and DOES 1 through 10, inclusive; CCP §1060)

1. Plaintiff Skysun LLC is a California limited liability company and its principal place of business is in Los Angeles County, State of California.

1 2. Plaintiff Vladyslav Yurov is an individual who resides in Los Angeles County, State of
2 California.

3 3. Defendant City of Los Angeles is a municipal corporation located entirely in the County of Los
4 Angeles, State of California.

5 4. Plaintiffs are ignorant of the true names or capacities, whether individual, corporate, associate, or
6 otherwise of Defendants sued herein as DOES 1 through 10 inclusive, and therefore sue these
7 Defendants by such fictitious names. Plaintiffs will amend this complaint to allege their true names and
8 capacities once they have been ascertained. Plaintiffs are informed and believe and thereon allege that
9 each of the fictitiously named Defendants are negligently or otherwise responsible in some manner for
10 the occurrences herein alleged and that Plaintiffs have suffered injury and damages, as herein alleged,
11 which were proximately caused by such Defendants.

12 5. Plaintiffs further allege that at all times herein mentioned, each Defendant, including Defendants
13 DOES 1 through 10, was the agent, servant, and/ or employee of each of the remaining Defendants, and
14 in doing the things hereinafter alleged, were acting within the purpose and scope of their authority as
15 such agent, servant, and employee, and with the knowledge, permission, and consent (express or
16 implied) of each of the remaining Defendants.

17 6. Prior to December 2018, the City of Los Angeles did not restrict the length of occupancies in
18 apartment houses. *People v. Venice Suites, LLC* (2021) 71 Cal.App.5th 715.

19 7. Prior to December 2018, Plaintiffs rented residential rental units for a period of 30 days or less.
20

21 8. Since December 2018, the City of Los Angeles has purportedly enacted and enforced a
22 restriction of short term rentals within the City pursuant to legislation named the “Home Sharing
23 Ordinance.” The Home Sharing Ordinance purports to severely curtail short term rentals in the City of
24 Los Angeles, including but not limited to a complete ban of said rentals in rent stabilized units.

25 9. Recently, the City alleged that Plaintiffs are operating short term rentals in violation of the Home
26 Sharing Ordinance, and issued investigative subpoenas directed to the Plaintiffs. The City has also
27 threatened to initiate legal proceedings against Plaintiffs stemming from allegations that Plaintiffs
28

1 violated the Home Sharing Ordinance. Plaintiffs deny that they violated the Home Sharing Ordinance,
2 and deny that the Home Sharing Ordinance is enforceable against them as applied.

3 10. Notwithstanding the Home Sharing Ordinance, Plaintiffs possess a vested right to operate short
4 term rentals in the City of Los Angeles. Plaintiffs contend that the Home Sharing Ordinance is
5 inapplicable to Plaintiffs by virtue of including but not limited to Plaintiffs' vested rights. The City has
6 no right to restrict Plaintiffs' said vested rights. See *Goat Hill Tavern v. City of Costa Mesa* (1992) 6
7 Cal.App.4th 1519, and *People v. Venice Suites, LLC* (2021) 71 Cal.App.5th 715.

8 11. An actual controversy has arisen and now exists between Plaintiffs and Defendants concerning
9 their respective rights and duties in that the City of Los Angeles contends that Plaintiffs violated the
10 Home Sharing Ordinance, whereas Plaintiffs dispute this contention.

11 12. Plaintiffs desire a judicial determination as to their rights and duties in regard to the City of Los
12 Angeles' enforcement actions against Plaintiffs for allegedly violating the Home Sharing Ordinance,
13 which Plaintiffs deny. A judicial declaration is necessary and appropriate at this time under the
14 circumstances in order that Plaintiffs may ascertain their aforementioned rights and duties.

15 13. Plaintiffs have been damaged in an amount to be proven.

16 WHEREFORE, Plaintiffs pray against Defendants:

17 1. That a judicial determination be made of the rights and duties of Plaintiffs and Defendants
18 as to Defendants' enforcement actions against Plaintiffs for allegedly violating the Home Sharing
19 Ordinance, which Plaintiffs deny;

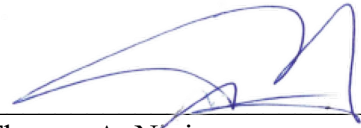
20 2. That a judicial declaration be made that Plaintiffs have the right to operate short term
21 rentals in the City of Los Angeles notwithstanding the Home Sharing Ordinance;

22 3. For Plaintiffs' costs of action; and

23 4. For such other and further relief that court may deem just and proper.

24 Dated: May 1, 2024

25 **LAW OFFICES OF THOMAS A. NITTI**

26 By: 

27 Thomas A. Nitti,
28 Attorneys for Plaintiffs